



1301 Avenue of the Americas
25th Floor
New York, NY 10019

646 927 5500 main
646 927 5599 fax

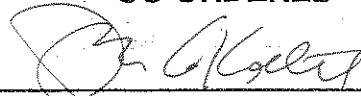
Harlan Levy
646-927-5554 direct
hlevy@foleyhoag.com

March 1, 2022

VIA ECF

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED
SO ORDERED

3/1/22

John G. Koeltl, U.S.D.J.

Re: *United States v. Hayes, et al.*, No. 20 Cr. 500 (JGK)

Dear Judge Koeltl:

We represent Defendant Benjamin Delo in the above-referenced matter. We respectfully submit this letter to request modification of Mr. Delo's conditions of pre-trial release, which were continued at Mr. Delo's February 24, 2022 change of plea hearing, for an upcoming trip to Savannah, Georgia from March 5, 2022 to March 7, 2022. While in the United States, Mr. Delo requests that the Court extend the areas in which he is permitted to travel to include the Southern District of Georgia. For this trip, Mr. Delo requests that he retain possession of his British passport, the surrender of which would otherwise be required by his bail conditions while he is in the United States. Pretrial services does not object to this request and the government defers to pretrial services.

Respectfully submitted,

/s/ Harlan A. Levy
Harlan A. Levy
FOLEY HOAG LLP
1301 Avenue of the Americas
New York, New York 10019
Tel: (646) 927-5500
hlevy@foleyhoag.com

cc: AUSA Samuel Raymond (via ECF)
AUSA Jessica Greenwood (via ECF)
USPT Karina Vilefort (via Email)